

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*County of Lake, Ohio v. Purdue
Pharma L.P., et al.,
Case No. 18-op-45032 (N.D. Ohio)*

*County of Trumbull, Ohio v. Purdue
Pharma, L.P., et al.,
Case No. 18-op-45079 (N.D. Ohio)*

“Track 3 Cases”

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**DECLARATION OF KELLY A. MOORE IN SUPPORT OF
PHARMACY DEFENDANTS’ MOTION TO
EXCLUDE ANNA LEMBKE**

I, Kelly A. Moore, declare as follows:

1. I am a partner at the law firm of Morgan, Lewis & Bockius LLP and counsel to Defendant Rite Aid Hdqtrs. Corp., Rite Aid of Ohio, Inc., Rite Aid of Maryland, Inc. d/b/a Rite Aid Mid-Atlantic Customer Support Center and Eckerd Corp. d/b/a Rite Aid Liverpool Distribution Center.
2. I make this declaration to place before the Court certain materials relied on in Pharmacy Defendants’ Motion to Exclude Anna Lembke.
3. Attached as **Exhibit A** is a true and correct copy of excerpts of Anna Lembke’s April 24, 2019 Track 1 Deposition.
4. Attached as **Exhibit B** is a true and correct copy of excerpts of Anna Lembke’s May 28, 2021 Track 3 Deposition.

5. Attached as **Exhibit C** is a true and correct copy of excerpts of Anna Lembke's Track 3 Expert Report.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of July, 2023.

/s/ Kelly A. Moore

Kelly A. Moore
MORGAN, LEWIS & BOCKIUS LLP
101 Park Avenue
New York, NY 10178
Phone: (212) 309-6612
Fax: (212) 309-6001
kelly.moore@morganlewis.com

Elisa P. McEnroe
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103
Phone: (215) 963-5917
Fax: (215) 963-5001
elisa.mcenroe@morganlewis.com